

PBW*Consulting Engineers
and Scientists*

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PASTOR, BEHLING & WHEELER, LLC
2000 S. Mays, Suite 300
Round Rock, TX 78664Tel (512) 671-3434
Fax (512) 671-3446August 17, 2005
(PBW Project No. 1259)

VIA OVERNIGHT DELIVERY

Mr. M. Gary Miller, Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-AP)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Ms. Barbara A. Nann, Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 6
Superfund Division (6RC-S)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: RI/FS Site Health and Safety Plan, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller and Ms. Nann:

Pursuant to Section V, Paragraph 29 of the Statement of Work (SOW) attached to the Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared the enclosed RI/FS Site Health and Safety Plan (HSP) on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow)(collectively referred to as Respondents in the UAO). Consistent with the requirements of Paragraph 30 of the SOW, this HSP has been prepared based on the format and content guidance provided in "Interim Final Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA" (EPA, 1988b). In accordance with the requirements of Paragraph 52 of the UAO, I certify that I have been fully authorized by the Respondents to submit this document and to legally bind all Respondents thereto.

Thank you for the opportunity to submit this plan. Please provide comments at your convenience. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

Enclosure (three copies)



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Mr. Gary Miller
August 17, 2005
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cc (one copy each):

Texas Commission on Environmental Quality
U.S. Department of Interior
U.S. Fish and Wildlife Service
United States Geological Survey
National Oceanic and Atmospheric Administration
Texas Parks and Wildlife Department
Texas General Land Office
Mr. Brent Murray - Sequa Corporation
Mr. Scott Magelssen - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morris III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP